

IN THE CIRCUIT COURT OF THE  
15TH JUDICIAL CIRCUIT IN AND  
FOR PALM BEACH COUNTY  
FLORIDA

B.B.,

CASE NO:

Plaintiffs,

50 2008 CA 03 73 19 XXXX MB

vs.

① JEFFREY EPSTEIN,  
and SARAH KELLEN,

Defendants.

COMPLAINT

Plaintiff, JANE DOE (B.B.), brings this Complaint against Defendants, JEFFREY EPSTEIN and SARAH KELLEN, and states as follows:

**Parties, Jurisdiction and Venue**

1. B.B. brings this Complaint under a fictitious name to protect her identity, because the Complaint makes sensitive allegations of sexual assault and abuse that she suffered while a minor.
2. B.B. is a citizen and resident of the State of Florida. She is currently over the age of 18 and otherwise *sui juris*.
3. Defendant, Jeffrey Epstein, is currently incarcerated in Palm Beach County, is a citizen and resident of Palm Beach County, Florida, has full intent to stay in Palm Beach County after his incarceration and is otherwise *sui juris*.
4. Defendant, Sarah Kellen, is a citizen and resident of the State of New York and otherwise *sui juris*.

5. This is an action for damages in excess of Fifteen Thousand Dollars (\$15,000), exclusive of interest and costs.

6. Venue is proper in this Court under section 47.011, Florida Statutes, because the causes of action brought herein accrued in Palm Beach County, Florida, and one or more Defendants reside in Palm Beach County, Florida.

### **Factual Allegations**

7. At all relevant times, Defendant, Jeffrey Epstein, was an adult male. Mr. Epstein is a financier and money manager with a secret clientele limited exclusively to billionaires. He is a man of tremendous wealth, power and influence. Before confinement, he maintained homes in New York, New Mexico, St. Thomas, U.S. Virgin Islands, and Palm Beach, Florida. The allegations herein concern Mr. Epstein's conduct while at his lavish estate in Palm Beach.

8. Upon information and belief, Mr. Epstein has a sexual preference and obsession for minor girls. He engaged in a plan, scheme, and/or enterprise wherein he gained access to primarily economically disadvantaged minor girls in his Palm Beach home and sexually assaulted the girls, or coerced or attempted to coerce the girls to engage in prostitution, and then gave them money.

9. In or about 2005, B.B., then 15 years old, fell victim to Mr. Epstein's trap described above, at Mr. Epstein's Palm Beach estate.

10. Upon information and belief, Mr. Epstein carried out this scheme/enterprise and assaulted girls in Florida, New York and on his private island, known as Little St. James, in St. Thomas, U.S. Virgin Islands.

11. Integral conspirators in Mr. Epstein's Florida scheme/enterprise were Defendant; Sarah Kellen, an assistant of Mr. Epstein from New York City, New York; and Haley Robson, a

Palm Beach Community College student from Loxahatchee, Florida; and other Jane Does. Ms. Kellen, Ms. Robson and other Jane Does recruited girls ostensibly to give a wealthy man a platonic massage for monetary compensation in his Palm Beach mansion. Under Mr. Epstein's plan/enterprise, Ms. Robson was contacted shortly before or soon after Mr. Epstein was at his Palm Beach residence. Mr. Epstein, or Ms. Kellen, or someone on their behalf, directed Ms. Robson and others to bring one or more underage girls to Mr. Epstein's residence. Upon information and belief, economically-disadvantaged, underage girls from Loxahatchee and surrounding areas were specifically targeted because they were easier to entice by the money being offered (generally \$200 to \$300 per "massage" session) and these girls were perceived as less likely to complain to authorities or have credibility if allegations of improper conduct were made. This was pivotal to Mr. Epstein's plan/enterprise.

12. Mr. Epstein's plan, scheme, and/or enterprise had a particular pattern and method. Upon arrival at Mr. Epstein's mansion, the underage girls would be introduced to Ms. Kellen, who in turn gathered the victim's personal information, including her name and telephone number. The girls would then be brought up a flight of stairs to a bedroom that contained, among other furnishings, a massage table. Photographs of nude women lined the stairway hall and bedroom. Ms. Kellen would then leave the girl alone in this room, whereupon Mr. Epstein would enter wearing only a towel. Mr. Epstein would then remove his towel, lay down naked on the massage table, and direct the girl to remove her clothes. He then would perform one or more lewd, lascivious and sexual acts, including masturbation, touching the girl's vagina with a vibrator, or digitally penetrating the girl's vagina, and coerce or attempt to coerce the girl to engage in lewd acts and/or prostitution.

**Facts Specific to B.B.**

13. Consistent with the foregoing plan, scheme, and/or enterprise, B.B., then 15 years of age, was recruited to give Mr. Epstein a massage for monetary compensation. B.B. was brought by taxi with another girl 15 years of age to Mr. Epstein's mansion in Palm Beach. B.B. and the other girl were brought into the kitchen of the home and led up the flight of stairs to a large bathroom containing a massage table. Upon arriving in the bathroom, a young woman, on information and belief, Ms. Kellen, exited a sauna wearing only a towel, placed a tube of lotion on the counter and stated, "I guess you will need this more than I will."

14. Several minutes later, Mr. Epstein came into the bathroom and shut the door behind him, told both girls to remove their clothes and undressed himself. Mr. Epstein then placed a small washcloth over his genitals and asked both girls to rub lotion on his naked body. At some point Mr. Epstein told the other 15 year old girl to leave the room, leaving B.B. alone with Mr. Epstein. Mr. Epstein then began to masturbate while B.B. was massaging him.

15. At this point, Mr. Epstein specifically asked B.B. her age, to which B.B. honestly advised she was 15 years old.

16. Mr. Epstein took his free hand and began to touch B.B. between her legs and in her genitals while simultaneously masturbating himself. B.B. told Mr. Epstein to stop, but he continued to rub B.B. between her legs in her genital area. Mr. Epstein then ejaculated and told B.B. she could get dressed.

17. B.B. was then allowed to get dressed, leave the room and go back down the stairs and into the kitchen. Mr. Epstein gave the other 15 year old girl money and told B.B. that this girl "had her money" and then left. B.B. was given \$200 by the other 15 year old girl.

18. As a result of this encounter with Mr. Epstein, the 15 year old B.B. experienced confusion, shame, humiliation and embarrassment, and the assault sent her life into a downward spiral.

#### **COUNT I**

##### **Sexual Assault and Battery against Defendant Epstein**

19. Plaintiff B.B. repeats and realleges paragraphs 1 through 18 above.
20. This is a count for sexual assault and battery against Defendant, Mr. Epstein.
21. Mr. Epstein tortiously and sexually assaulted B.B.
22. Mr. Epstein's actions amounted to an unapproved and intentional touching.
23. Mr. Epstein's sexual assault violated Chapter 800 of the Florida Statutes, which defines Mr. Epstein's lewd and lascivious acts upon B.B., as a crime.
24. As a direct and proximate result of Mr. Epstein's assault on B.B., she has suffered and will continue to suffer severe and permanent traumatic injuries, including mental, psychological and emotional damages.

WHEREFORE, Plaintiff, B.B., demands judgment against Defendant, Jeffrey Epstein, for compensatory damages, costs, attorney's fees, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

#### **COUNT II**

##### **Civil Conspiracy against Defendants Epstein and Kellen**

25. Plaintiff B.B. repeats and reallege paragraphs 1 through 18 above.
26. This is a count for civil conspiracy against the Defendants, Mr. Epstein and Ms. Kellen.

27. Defendant, Mr. Epstein and Ms. Kellen, conspired to subject B.B. to the sexual assault and battery by Defendant, Mr. Epstein.

28. Each Defendant committed an overt act in furtherance of the conspiracy: Defendant Kellen assisted Epstein so that he could sexually assault B.B.; and, Defendant Epstein actually committed sexual assault and battery against B.B.

29. As a direct and proximate result of Defendants' civil conspiracy, B.B. has suffered and will continue to suffer severe and permanent traumatic injuries, including mental, psychological and emotional damages.

WHEREFORE, Plaintiff B.B. demands judgment against Defendants, Jeffrey Epstein and Sarah Kellen, for compensatory damages, costs, attorney's fees, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

**COUNT III**  
**Intentional Infliction of Emotional Distress against**  
**Defendants Epstein and Kellen**

30. Plaintiff B.B. repeats and realleges paragraphs 1 through 18 above.

31. This is a count for intentional infliction of emotional distress against Defendants, Mr. Epstein and Ms. Kellen.

32. The conduct of Defendants Mr. Epstein and Ms. Kellen in subjecting B.B. to Mr. Epstein's sexual assault and battery, was intentional or reckless.

33. The conduct of Defendants, Mr. Epstein and Ms. Kellen in subjecting B.B. to Mr. Epstein's sexual assault and battery was outrageous, going beyond all bounds of decency.

34. The conduct of Defendants Mr. Epstein and Ms. Kellen, in subjecting B.B. to Mr. Epstein's sexual assault and battery, caused B.B. severe emotional distress. Defendants knew or

had reason to know that their intentional and outrageous conduct would cause emotional trauma and damage to B.B.

35. As a direct and proximate result of Defendants' intentional or reckless conduct, B.B. suffered and will continue to suffer severe mental anguish and pain.

WHEREFORE, Plaintiff B.B. demands judgment against Defendants, Jeffrey Epstein and Sarah Kellen, for compensatory damages, costs, attorney's fees, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.

**COUNT IV**  
**Civil Remedy for Violation of Florida Statute Section 772.103 against**  
**Defendants Epstein, Robson and Kellen**

36. Plaintiffs, S.G. and B.B., repeat and reallege paragraphs 1 through 18 above.

37. This is a count for Defendants' violation of Florida Statute § 772.103.

38. Defendants participated in an enterprise, or conspired or endeavored to so participate, through a pattern of criminal activity, in violation of Florida Statute section 772.103(3)-(4).

39. Defendants engaged in this pattern of criminal activity by engaging in at least two of the following incidents of criminal activity with the same or similar intents, results, accomplices, victims, and methods of commission within a 5 year period:

- a. Procuring for prostitution, or causing to be prostituted, any person who is under the age of 18 years in violation of Florida Statute section 796.03;
- b. Soliciting, inducing, enticing, or procuring another to commit prostitution, lewdness, or assignation in violation of Florida Statute section 796.07(2)(f), or aiding, abetting or participating in such acts in violation of Florida Statute section 796.07(2)(h);

- c. Knowingly recruiting, enticing, harboring, transporting, providing, or obtaining by any means a person, knowing that force, fraud, or coercion will be used to cause that person to engage in prostitution in violation of Florida Statute section 796.045; or,
- d. Forcing, compelling, or coercing another to become a prostitute in violation of Florida Statute section 796.04.

40. Under Defendants' plan, scheme and enterprise, Mr. Epstein paid Ms. Robson and others to repeatedly find and bring him underage girls, who were delivered to Mr. Epstein by Defendant Ms. Kellen, Ms. Robson and other Jane Does, in order for Mr. Epstein to solicit, induce, coerce, entice, compel or force such girls to engage in acts of prostitution and/or lewdness.

41. Plaintiff B.B., was the victim of Defendants' plan, scheme and enterprise. Ms. Kellen assisted Mr. Epstein in obtaining these underage girls. B.B. was left alone in the room with Mr. Epstein. Mr. Epstein told B.B. to remove her clothes. Mr. Epstein wore a towel in front of B.B., and removed the towel to masturbate in front of B.B.. In shock, fear and trepidation, B.B. complied with Mr. Epstein's requests.

42. Mr. Epstein paid B.B. \$200. Mr. Epstein paid various Jane Does, including Ms. Robson, \$200 for bringing girls, including but not limited to B.B., to him.

WHEREFORE, Plaintiff B.B., demands judgment against Defendants, Jeffrey Epstein and Sarah Kellen, for compensatory damages, treble damages under Florida Statute section 772.104, costs and attorney's fees under Florida Statute section 772.104, and such other and further relief as this Court deems just and proper. Further, Plaintiff reserves the right to amend this Complaint to add a claim for punitive damages pursuant to Florida Law.



**JURY TRIAL DEMAND**

Plaintiff demands a jury trial in this action.

Dated: November 25, 2008

Respectfully submitted,

LEOPOLD~KUVIN, P.A.  
2925 PGA Blvd., Suite 200  
Palm Beach Gardens, FL 33410  
Phone: 561-515-1400  
Fax: 561-515-1401

By: \_\_\_\_\_

THEODORE J. LEOPOLD  
Florida Bar No.: 705608  
SPENCER T. KUVIN  
Florida Bar No.: 089737

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R E C E I P T  
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PALM BEACH CTY CIR CT JISPROD

Receipt Number: CAMB262250  
Date: 03-DEC-2008  
Cashier: ELOWERY1

Payor: LEOPOLD-KUVIN PA  
Addr:

Violation/Docket	Description	Amount
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Case: 2008CA037319 - BB V JEFFREY EPSTEIN

Party: B B

CAFF		301.00
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CAFF		20.00
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	CHECK RECEIVED GENERAL ACCT	-321.00
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Total Fees: 321.00

Total Payment: 321.00

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